

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF
EDUCATORS, BARBARA PHILLIPS,
JAMES THOMAS, DAWN ZIMMERER,
L.E. JIBOL, UNITED CAMPUS
WORKERS SOUTHEAST LOCAL 3821,
MADISYN DONLEY, ALEXIS COBBS,
KAREN ADERER, FOSTERING
LGBTQ+ ADVOCACY, RESOURCES,
ENVIRONMENTS AND WOMEN IN
SCIENCE AND ENGINEERING,

Civil No. 3:25cv00417-HTW-LGI

Plaintiffs,

v.

LYNN FITCH, ET AL.,

Defendants.

**PLAINTIFF MISSISSIPPI ASSOCIATION OF EDUCATORS' MOTION TO BE
REMOVED AS PLAINTIFF**

Plaintiff Mississippi Association of Educators ("MAE"), through undersigned counsel, hereby requests, pursuant to Rule 21 of the Federal Rules of Civil Procedure, that it be removed as a plaintiff. In support thereof, MAE sets forth as follows:

1. Rule 21 provides that the Court "may at any time, on just terms, add or drop a party."
2. MAE has informed counsel today that it does not wish to be a plaintiff in this matter and wants to be removed from the case altogether.
3. Counsel for Plaintiffs anticipate requesting in the near future leave to add plaintiffs whose position regarding the constitutionality of H.B. 1193 and the harm they will

suffer is identical to MAE. As a result, Defendants will suffer no prejudice as a result of MAE's dismissal, and the interests of judicial economy will not be implicated.

4. This motion is filed pursuant to counsel's duty of candor to the Court.

Based on the foregoing, Plaintiff MAE respectfully requests that it be removed from this action. Plaintiff MAE requests further that its name not be listed in the style of the case following its removal as a party.

Dated: July 11, 2025

Respectfully submitted,

<p><u>S/ ROBERT B. McDUFF</u> ROBERT B. McDUFF MS BAR No. 2532 PALOMA WU MS BAR No. 105464 MISSISSIPPI CENTER FOR JUSTICE 210 E. CAPITOL STREET, STE 1800 JACKSON, MS 39201 PHONE: (601) 259-8484 RMCDUFF@MSCENTERFORJUSTICE.ORG PWU@MSCENTERFORJUSTICE.ORG</p> <p>AMIR BADAT MS BAR No. 106599 BADAT LEGAL PLLC P.O. Box 15 TOUGALOO, MS 39174 PHONE: (601) 462-9592 AMIR.BADAT@GMAIL.COM</p>	<p><u>S/ JOSHUA TOM</u> JOSHUA TOM MS BAR. No 105392 McKENNA RANEY MS BAR No. 106330 AYANNA HILL MS BAR No. 106590 AMERICAN CIVIL LIBERTIES UNION OF MISSISSIPPI FOUNDATION, INC. P.O. Box 2242 JACKSON, MS 39225 PHONE: (601) 354-3408 JTOM@ACLU-MS.ORG MRANEY@ACLU-MS.ORG AHILL1@ACLU-MS.ORG</p> <p>NICOLAS STANOJEVICH* QUINN, CONNOR, WEAVER, DAVIES & ROUCO LLP 2 20TH STREET NORTH, SUITE 930 BIRMINGHAM, AL 35203 PHONE: (205) 870-9989 NSTANOJEVICH@QCWDR.COM *ADMITTED PRO HAC VICE</p> <p><i>COUNSEL FOR PLAINTIFFS</i></p>
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CERTIFICATE OF SERVICE

I certify that the foregoing has been filed on the ECF system which served all counsel of record on this 11th day of July, 2025.

s/ Joshua Tom
Joshua Tom
Co-counsel for Plaintiffs